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11 *Attorneys for Defendants*  
12 UBER TECHNOLOGIES, INC.,  
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13

14 **IN THE UNITED STATES DISTRICT COURT**  
15 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

16 IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
17 LITIGATION

Case No. 3:23-md-03084-CRB (LJC)

18 This Document Relates to:

19 *Jaylynn Dean v. Uber Technologies, Inc., et al.*,  
20 3:23-CV-06708  
21

**STIPULATION AND ORDER TO  
PERMIT PROVISIONALLY FILING  
UNDER SEAL**

Judge: Hon. Lisa J. Cisneros  
Courtroom: G – 15th Floor

22 WHEREAS, on December 19, 2025, Uber and Plaintiffs will file a letter motion concerning  
23 Uber's motion to strike the supplemental reports of Plaintiffs' experts Lacey Keller and John  
24 Chandler ("Letter Motion").

25 WHEREAS, the exhibits to the Letter Motion include extensive expert reports, whose  
26 subject matter significantly overlaps with documents that are the subject of other sealing motions  
27 that have been or will be filed with Judge Breyer.

28 WHEREAS, the parties agree that exhibits to the Letter Motion (and any redactions to the  
STIPULATION TO PERMIT PROVISIONAL FILING

Letter Motion itself) should be filed provisionally under seal to provide additional time for Uber to file a substantive motion to seal so that it may harmonize its sealing requests with its other sealing motions.

Whereas the parties agree that Uber's motion to seal the exhibits to the Letter Motion should be due on or before December 30, 2025, the date on which Uber's statement concerning the sealing of plaintiffs' summary judgment opposition papers is due to be filed with Judge Breyer. ECF 4691.

WHEREAS, the Court has extended other deadlines in the case, but not this one.

WHEREAS, the requested extension will have no bearing of the rest of the case schedule.

THEREFORE, the parties respectfully request the Court enter the parties' stipulation permitting the parties to file the exhibits to the Letter Motion provisionally under seal and extending Defendants' deadline to file its motion to seal those exhibits until December 30, 2025.

**IT IS SO STIPULATED.**

DATED: December 19, 2025

Respectfully submitted,

By: /s/ Laura Vartain Horn

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1 Dated: December 19, 2025

/s/ Andrew R. Kaufman

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28 *Co-Lead Counsel for Plaintiffs*

**ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), I attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's consent and have authorized the filing.

Dated: December 19, 2025

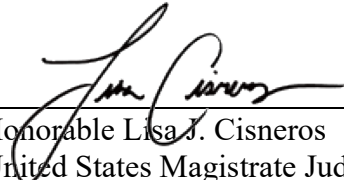
/s/ Laura Vartain Horn

Laura Vartain Horn

**ORDER**

**IT IS SO ORDERED.**

Dated: December 19, 2025

  
\_\_\_\_\_  
Honorable Lisa J. Cisneros  
United States Magistrate Judge